

LOEVY + LOEVY

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## Robinson: Subpoena Response

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Annie Prossnitz <prossnitz@loevy.com>

Fri, Oct 18, 2024 at 9:07 PM

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Counsel,

Please find a Hightail link below with the documents responsive to Defendants' subpoena to Blegen & Garvey. Attached is the accompanying privilege log.

<https://spaces.hightail.com/space/pDoyWW72nj>

In addition to these documents, Plaintiff's post-conviction attorneys produced 901 prison phone call recordings. We would like to have a discussion regarding these recordings within the context of Defendant's request for prison phone calls writ large, given the burden of reviewing these calls, the implication of attorney-client privilege, and Plaintiff's position that they are disproportionate to the needs of the case. Please let us know your availability to discuss.

Thank you,  
Annie

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**Annie Prossnitz** (she/her/hers)

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